

1 Alison R. Kertis, Esq. (NSB 13875)
 2 akertis@sierracrestlaw.com
 3 Jerry C. Carter, Esq. (NSB 5905)
 jcarter@sierracrestlaw.com
 4 SIERRA CREST BUSINESS LAW GROUP
 5 6770 S. McCarran Blvd., Reno, Nevada 89509
 (775) 448-6070, Facsimile: (775) 473-8292
 6 *Counsel for Defendant BUILD OUR CENTER*

7
 8 UNITED STATES DISTRICT COURT
 9 DISTRICT OF NEVADA

10 DREW RIBAR,
 11 Plaintiff,
 12 v.

13 WASHOE COUNTY; WASHOE COUNTY
 14 LIBRARY SYSTEM; JEFF SCOTT; THANH
 NGUYEN; JAMIE HEMINGWAY; BEATE
 WEINERT; STACY MCKENZIE; JONNICA
 BOWEN; BEN WEST; BUILD OUR
 CENTER, INC.; STACEY SPAIN;
 ANGELINE PETERSON; CHRISTOPHER
 DANIELS; DEPUTIES ROTHKIN, SAPIDA,
 GOMEZ; KRISTEN RYAN, JENNIFER
 COLE; and JOHN/JANE DOES 1-10;

15 Defendants.

16 Case No. 3:24-cv-00526

17
DEFENDANT
BUILD OUR CENTER'S
RESPONSE TO PLAINTIFF DREW
RIBAR'S SUPPLEMENTAL
OPPOSITION TO DEFENDANT
BUILD OUR CENTER'S ERRATA
RE MOTION FOR CASE
MANAGEMENT CONFERENCE,
RESTRAINING ORDER, AND
SANCTIONS

18 Defendant BUILD OUR CENTER INC., by and through its undersigned
 19 counsel, respectfully files *Defendant Build Our Center's Response to Plaintiff*
Drew Ribar's Supplemental Opposition to Defendant Build Our Center's Errata Re
Motion for Case Management Conference, Restraining Order and Sanctions.

20 This *Response* is made and based upon all records and pleadings on file
 21 herein, together with every exhibit attached hereto (each of which is incorporated
 22 herein by reference), as well as the points and authorities set forth directly below.

23 In support of this *Response*, BOC states as follows:

24
MEMORANDUM OF POINTS AND AUTHORITIES

25 To the extent a response is necessary to *Plaintiff's Supplemental Opposition*
 26 to *Defendant Build Our Center's Errata re Motion for Case Management*
 27 *Conference, Restraining Order, and Sanctions* ("Supplemental Opposition") [ECF

1 137], BOC responds as follows: BOC filed an Errata on September 22, 2025 [ECF
2 133] solely to correct typographical errors in its Motion [ECF 130]. Filing an
3 errata to clarify minor mistakes is standard practice and was not, as Mr. Ribar
4 alleges, a nefarious attempt to “back-door amend” BOC’s Motion. The corrections
5 merely clarify the record and introduce no new factual or legal arguments. As
6 such, the Court should disregard Mr. Ribar’s Supplemental Opposition and
7 consider the filing as more documentation of Mr. Ribar’s continued vexatious
8 litigation. Further, Mr. Ribar is precluded from filing a supplement without leave
9 of court. LR 7-29(g). “A party may not file supplemental pleadings, briefs,
10 authorities, or evidence without leave of court granted for good cause. The judge
11 may strike supplemental filings made without leave of court.” *Id.*

DATED September 30, 2025. SIERRA CREST BUSINESS LAW GROUP

/s/ Alison R. Kertis, Esq.
By: _____
Alison R. Kertis Esq.
jcarter@sierracrestlaw.com
Alison R. Kertis, Esq. (NSB 13875)
akertis@sierracrestlaw.com
6770 S. McCarran Blvd., Reno, NV 89509
(775) 448-6070, Fax: (775) 473-8292
Counsel for Defendant Build Our Center

1 CERTIFICATE OF SERVICE

2 I certify that I am an employee of the SIERRA CREST BUSINESS LAW
3 GROUP who, on the below-written date, caused a true copy of the foregoing to
4 be transmitted via email and also to be filed using the above-entitled Court's
5 electronic filing (CM/ECF) system which will automatically e-serve the same) on
6 the person(s) and/or entity(ies) set forth directly below:

7
8 **Drew Ribar**
9 480 Pershing Lane, Washoe Valley, NV 89704
10 (775) 223-7899
11 const2audit@gmail.com
12 *Plaintiff in propria persona*

13
14 **Lindsay L. Liddell** (SBN 14079)
15 **Andrew Cobi Burnett** (SBN 16505)
16 DEPUTY DISTRICT ATTORNEYS
17 One South Sierra Street Reno, NV 89501
18 lliddell@da.washoecounty.gov
19 cburnett@da.washoecounty.gov
20 (775) 337-5700
21 *Counsel for Plaintiffs Washoe County and its Library
22 System, Jeff Scott, Stacy Mckenzie, Jonnica Bowen,
23 Jennifer Cole; Deputy C. Rothkin, Deputy R. Sapida,
24 and Sgt. George Gomez*

25 DATED: September 30, 2025.

26 /s/ *Monica R. Leazer*

27
28 _____
29 an employee of the
30 SIERRA CREST BUSINESS LAW GROUP

INDEX OF EXHIBITS

to

**DEFENDANT BUILD OUR CENTER'S RESPONSE TO
PLAINTIFF DREW RIBAR'S SUPPLEMENTAL OPPOSITION TO
DEFENDANT BUILD OUR CENTER'S ERRATA RE MOTION FOR CASE
MANAGEMENT CONFERENCE, RESTRAINING ORDER, AND SANCTIONS**

re

Ribar vs. Washoe County, et alia
(Case No. 3:24-cv-00526)